

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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UNITED STATES OF AMERICA	:	CRIMINAL ACTION
	:	
VS.	:	
	:	
ALAN KANE	:	NO. 24-14-2

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**ORDER TO SEAL**

AND NOW, this                      day of                      , 2025, it is hereby ORDERED that Defendant's Sentencing Memorandum and accompanying exhibits are SEALED until further order of this Court.

**BY THE COURT:**

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**HONORABLE MICHAEL M. BAYLSON**

**PAUL J. HETZNECKER, ESQUIRE**  
**Attorney I.D. No. 49990**  
**1420 Walnut Street, Suite 911**  
**Philadelphia, PA 19102**  
**215 893-9640**

**Attorney for Defendant, Alan Kane**

**IN THE UNITED STATES DISTRICT COURT  
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<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL ACTION</b>
	<b>:</b>	
<b>VS.</b>	<b>:</b>	
	<b>:</b>	
<b>ALAN KANE</b>	<b>:</b>	<b>NO. 24-14-2</b>

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**MOTION TO SEAL DEFENDANT’S SENTENCING MEMORANDUM AND EXHIBITS**

**TO THE HONORABLE MICHAEL M. BAYLSON, JUDGE, UNITED STATES  
DISTRICT COURT, EASTERN DISTRICT OF PENNSYLVANIA**

Alan Kane, by and through his attorney Paul J. Hetznecker, Esquire, files this Motion to Seal Defendant’s Sentencing Memorandum and Exhibits and submits the following in support thereof:

1. Counsel for Defendant Alan Kane requests that Defendant’s Sentencing Memorandum along with Exhibits A, B, and C be filed under seal due to sensitive information contained within these documents.
2. Counsel respectfully requests that Your Honor grant the attached Order sealing this Motion.

Respectfully submitted,

/s/ Paul J. Hetznecker, Esquire  
Paul J. Hetznecker, Esquire  
Attorney for Defendant, Alan Kane

Date: April 28, 2025

**CERTIFICATE OF SERVICE**

I, Paul J. Hetznecker, hereby certify that a true and correct copy of Defendant's Motion to File Under Seal was served on the following via ecf:

Mark Dubnoff, Esquire  
Assistant United States Attorney  
615 Chestnut Street, 12<sup>th</sup> Floor  
Philadelphia, PA 19106

Hannah J. McCollum, Esquire  
Office of the U.S. Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19017

/s/ Paul J. Hetznecker, Esquire  
Paul J. Hetznecker, Esquire  
Attorney for Defendant, Alan Kane

Date: April 28, 2025